

1 KAMALA D. HARRIS
Attorney General of California
2 RICHARD F. WOLFE
Supervising Deputy Attorney General
3 MICHAEL P. CAYABAN
Deputy Attorney General
4 State Bar No. 179252
110 West A Street, Suite 1100
5 San Diego, CA 92101
P.O. Box 85266
6 San Diego, CA 92186-5266
Telephone: (619) 645-2014
7 Fax: (619) 645-2012
E-mail: Mike.Cayaban@doj.ca.gov
8 *Attorneys for Defendants California*
Highway Patrol and Officer Sergio Flores
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10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE SOUTHERN DISTRICT OF CALIFORNIA
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14 **JACOB GREGOIRE,**

15 Plaintiff,

16 v.

17 **CALIFORNIA HIGHWAY**
18 **PATROL, an agency of the State of**
19 **California; SERGIO FLORES, and**
DOES 1 to 20,

20 Defendants.
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22
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14-cv-1749 GPC (DHB)

**JOINT MOTION TO CONTINUE
EARLY NEUTRAL EVALUATION**

Current Date: September 12, 2014
Current Time: 2:00 p.m.

Proposed Date: September 26, 2014
Proposed Time: 2:00 p.m.

Courtroom: Tenth Floor (Annex)
Judge: The Honorable David H.
Bartick

Trial Date: None Set
Action Filed: June 12, 2014

24 Plaintiff Jacob Gregoire and Defendants California Highway Patrol and Sergio
25 Flores move jointly for an order to continue the Early Neutral Evaluation from
26 September 12, 2014 to September 26, 2014 at 2:00 p.m. Good cause for the
27 continuance exists because the Court's Chamber Rules require the personal
28

1 appearance of parties and agency representatives and Defendant California
2 Highway Patrol's client-representative is not available on September 12, 2014.

3
4 Dated: August 11, 2014

Respectfully submitted,

5 KAMALA D. HARRIS
6 Attorney General of California
7 RICHARD F. WOLFE
8 Supervising Deputy Attorney General

9 s/ Michael Cayaban
10 MICHAEL P. CAYABAN
11 Deputy Attorney General
12 *Attorneys for Defendants California*
13 *Highway Patrol and Officer Sergio*
14 *Flores*

15
16 Dated: August 11, 2014

THE GILLEON LAW FIRM
DANIEL M. GILLEON
STEVE HOFFMAN

17 s/ Steve Hoffman
18 STEVE HOFFMAN
19 *Attorneys for Plaintiff Jacob Gregoire*
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1 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative
2 Policies and Procedures of the United States District Court for the Southern District
3 of California, I certify that the content of this document is acceptable to counsel for
4 the Plaintiff and I have obtained authorization from Stephen Hoffman to affix his
5 signature to this document.

6
7 Dated: August 11, 2014

KAMALA D. HARRIS
Attorney General of California
RICHARD F. WOLFE
Supervising Deputy Attorney General

9
10 S / MICHAEL CAYABAN
MICHAEL P. CAYABAN
Deputy Attorney General
11 *Attorneys for Defendants California*
12 *Highway Patrol and Officer Sergio*
13 *Flores*

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15 SD2014707454
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DECLARATION OF SERVICE BY U.S. MAIL

Case Name: **Gregoire v. CHP**

No.: **14-cv-1749-GPC (DHB)**

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service with postage thereon fully prepaid that same day in the ordinary course of business.

On **August 11, 2014**, I served the attached

JOINT MOTION TO CONTINUE EARLY NEUTRAL EVALUATION

by placing a true copy thereof enclosed in a sealed envelope in the internal mail collection system at the Office of the Attorney General at 110 West A Street, Suite 1100, P.O. Box 85266, San Diego, CA 92186-5266, addressed as follows:

Daniel M. Gilleon
The Gilleon Law Firm
1320 Columbia Street, Suite 200
San Diego, CA 92101
Attorney for Plaintiff

Steve Hoffman
Law Offices of Steve Hoffman
1320 Columbia Street, Suite 200
San Diego, California 92101
Attorney for Plaintiff

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on **August 11, 2014**, at San Diego, California.

Lynnell Bowen

Declarant



Signature